September 8, 2005

Sheila Westerveld
Regulatory Affairs Specialist
King Industries
P.O. Box 558
Norwalk, CT 06852

Dear Ms. Westerveld:

This is in response to your email of September 6, 2005, referencing our telephone conversation on or about July 28. At that time we discussed EPA's questions about the King Industries HPV Challenge submission for diisononylnaphthalene and its derivatives, and your subsequent email asked that I put those questions in writing.

The issue is uncertainty about the chemical structures of the sponsored substances.

This category is defined to contain diisononylnaphthalene (63512-64-1), dinonylnaphthalenesulfonic acid (25322-17-2), dinonylnaphthalenesulfonic acid, barium salt (25619-56-1), and dinonylnaphthalenesulfonic acid, calcium salt. The test plan states that diisononylnaphthalene "is produced by the controlled alkylation of naphthalene with nonene", and is then used to prepare the other three members. EPA understands that, in the industry, "nonene" can refer either to linear nonene or to the branched nonene, tripropene, that is typically used to prepare C9-alkylated aromatics. The potential confusion in the test plan needs to be dispelled by clearly indicating the structure of the alkyl chain in the alkylation products.

The potential for confusion is compounded somewhat by the inconsistent names: di**isononyl**naphthalene vs. di**nonyl**naphthalenesulfonic acid etc. An acknowledgment and explanation of the discrepancy would be helpful.

Other useful information not included in the test plan: isomer distribution (typical amounts of the various possible dialkylnaphthalenes); content of monoalkyl and trialkyl and higher derivatives.

Revisions would be most helpful if conveyed as a revised test plan. However, a clarifying letter would also be adequate.

Sincerely,

/S/

Ralph C. Northrop, Ph.D.
Chemist, High Production Volume
Chemicals Branch

cc: M. Townsend